

As a licensed amateur radio operator, I am against the use of exposed or open line BPL. BPL poses a serious problem for any user of the HF Spectrum. This would include Amateur Radio Operators, Short Wave Listeners, Military and Transportation services. BPL drowns out many AM broadcast stations between 550 kHz to 1700 kHz. The broadcasters will complain that they are not able to reach the current market with their advertising and programming.

For example: Emmaus, PA, where BPL has been already been placed into service. Many listeners in Emmaus cannot hear KYW AM 1060 kHz in Philadelphia, with a 50,000 watt transmitter. BPL also renders the HF spectrum useless to Amateur Radio Operators within 100 meters of the exposed BPL lines.

Currently Cable Services deliver similar services via "Closed Circuit" cables and fiber optics. Leakage of the Cable Services into the HF and VHF spectrum are severely dealt with by the FCC. Leakage of BPL into the HF and VHF spectrum will not even be a violation as open wire cannot suppress leaking of RF. RF signals are not supposed to escape from or intrude into the cable TV lines. Radio signals can coexist with cable signals even on the same frequencies. Havoc occurs when signals leak into and out of the cables, thus it is in the best interests of the cable companies to fix the problem in a timely manner. There will be no such incentive for power companies running BPL.

If BPL is permitted, it should be only on shielded and filtered lines, similar to those required by the cable TV industry. I doubt the power companies will consider this practical, but that's too bad. Are the BPL users going to establish replacements for the current amateur radio emergency communications stations? Are they going to compensate other licensed users for the effective loss of spectrum and of revenue? Somehow I doubt it.

Currently, we hams frequently contend with noisy electric power lines, hardware, and transformers which interfere with our reception. The FCC requires the electric utilities to repair and clean up those lines. This will not be the case once BPL exists. To what purpose will those requirements serve, if BPL is permitted to saturate the airwaves?

Even if BPL is turned off during emergencies, what hams will be left to communicate? They will have quit in disgust, sold their equipment, and dismantled their stations. The FCC must protect the non commercial communications interests that invade the HF spectrum. To damage the HF infrastructure of over 1 million licensed amateur radio operators, is to remove the backbone of emergency communications.

There are better ways to accomplish the same goal that the power industry is seeking. Let us build covered bridges around the problem, not clear the village of all the infrastructure. If power companies wish to enter the broadband market, they can make use of the NII allocations under Part 15 or apply for data transmission licenses in the appropriate allocations. They could also string fiber optics along their established rights-of-way. They should not be permitted to pollute the spectrum to the detriment of all other licensed and unlicensed services including, but not limited to, amateur radio, broadcast, and public service.

BPL has been rejected in every nation it has been attempted. There is a reason for this. I strongly suggest that the Commission learn from their experiences and kill this idea aborning.